Safety Attribute Inspection (SAI) Data Collection Tool
1.3.23 Short-Term Escalations (AW)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

- To provide policy, procedures, instructions, and/or information in the manual, which allows personnel concerned with the D076 operations specifications authorized Short-Term Escalations process to perform their duties and responsibilities to a high degree of safety.

Objective (FAA oversight):

- To determine if the certificate holder's Short-Term Escalations process meets all applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR) and FAA policies.

- To determine if the certificate holder's Short-Term Escalations process incorporates the safety attributes.

- To identify any shortfalls in the certificate holder's Short-Term Escalations process.

Specific Instructions:

- Intentionally left blank

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

- SRRs:
  119.43(b)
  119.43(b)(1)
  119.43(b)(2)
  119.43(c)
  121.135(a)(1)
  121.135(b)(1)
  121.135(b)(2)
  121.135(b)(3)
  D.076
  D.076(a)
  D.076(b)
  D.076(b)(1)
  D.076(b)(2)
  D.076(b)(3)
  D.076(b)(4)

Related CFRs & FAA Policy/Guidance:

- Related CFRs:
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- FAA Policy/Guidance:
  FAA Order 8300.10, volume 2, chapter 80

SAI SECTION 1 - PROCEDURES ATTRIBUTE

Objective: Procedures, instructions, and information contained in the certificate holder's manual are documented methods for accomplishing a process. Policies contained in the certificate holder's manual should establish the certificate holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder's manual has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasks	
	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Short-Term Escalations process.
3.	Review the certificate holder's manual to ensure that it contains policies, procedures, instructions, and information necessary for the Short-Term Escalations process.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Does the content of the certificate holder's manual meet the specific regulatory and FAA policy requirements for a Short-Term Escalations process:	
1.1.	Does the certificate holder's manual contain procedures for the Short-Term Escalation of maintenance intervals? SRRs: D.076	☐ Yes ☐ No, Explain
1.2.	Does the certificate holder state in its manual that the procedures for short-term escalation of maintenance intervals for: SRRs: D.076(a)	
1.2.1	Powerplant components and accessories are subject to the limitaion of 10%, not to exceed 500 hours time-in-service ? SRRs: D.076(a)	☐ Yes ☐ No, Explain
1.2.2	Airframe components and appliances are subject to the limitaion of 10%, not to exceed 500 hours time-in-service? SRRs: D.076(a)	☐ Yes ☐ No, Explain
1.3.	Does the certificate holder state in its manual that Short-Term Escalation procedures do not apply to the following items: SRRs: D.076(b)	
1.3.1	Intervals specified by FAA airworthiness directives? SRRs: D.076(b)(1)	☐ Yes ☐ No, Explain
1.3.2	Life limits specified by type-certificate data sheets? SRRs: D.076(b)(2)	☐ Yes ☐ No, Explain
1.3.3	Limitations specified by minimum equipment lists? SRRs: D.076(b)(3)	☐ Yes ☐ No, Explain

1.3.4	Limitations specified by configuration deviation lists? SRRs: D.076(b)(3)	☐ Yes ☐ No, Explain
1.3.5	Structural sampling periods imposed by maintenance review boards? SRRs: D.076(b)(4)	☐ Yes ☐ No, Explain
1.4.	Does the certificate holder's manual contain the required references to, or excerpts from, operations specifications paragraph D076? SRRs: 119.43(b)	☐ Yes ☐ No, Explain
1.5.	If the certificate holder's manual includes excerpts from its operations specifications, are the excerpts clearly identified as part of the operations specifications? SRRs: 119.43(b)(1)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.6.	Does the certificate holder's manual require compliance with operations specifications paragraph D076? SRRs: 119.43(b)(2)	☐ Yes ☐ No, Explain
1.7.	Does the certificate holder's manual contain a method for keeping all persons engaged in its operations informed of the provisions of operations specifications paragraph D076? SRRs: 119.43(c)	☐ Yes ☐ No, Explain
1.8.	Does the certificate holder's Short-Term Escalations process comply with the guidance contained in FAA Order 8300.10? *Related Design JTIs:* 1. Check that the Certificate Holder's manual contains a general policy regarding, that the use of a short-term escalation for an individual component, engine or aircraft will be accomplished without effecting safety. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(1) 2. Check that the Certificate Holder's manual contains instructions and procedures that ensure Short-Term Escalations do not conceal unsound maintenance practices. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(1) *Interfaces:* 1.3.1(AW) 3. Check that the Certificate Holder's manual contains instructions and procedures that ensure Short-Term Escalations do not conceal maintenance program deficiencies. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(1) *Interfaces:* 1.3.1(AW); 1.3.2(AW) 4. Check that the Certificate Holder's manual contains instructions and procedures that ensure Short-Term Escalations do not conceal poor management decisions. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(1) 5. Check that the Certificate Holder's manual contains instructions and procedures that all extensions to Short-Term Escalations, require prior approval by the assigned principal inspector. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 1Paragraph 5A(2)	☐ Yes ☐ No, Explain

6.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation should only be used after carefully analyzing the history of the aircraft and its components.
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(4)
	Interfaces: 1.3.11(AW); 1.3.15(AW)
7.	Check that the Certificate Holder's manual contains instructions and procedures that the Short-Term Escalation review of the proposed escalation should include previous inspections results.
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(4)
	Interfaces: 1.3.11(AW); 1.3.15(AW)
8.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation include Supplemental / Additional inspections that may be needed to ensure continued airworthiness during the escalation
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(4)
	Interfaces: 1.3.1(AW); 1.3.2(AW)
9.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation must not cause items not covered by the escalation to exceed their maintenance intervals
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(4)
	Interfaces: 1.3.1(AW); 1.3.2(AW)
10.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation intervals shall be a percentage of an existing interval for a particular inspection.
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(5)
	Interfaces: 1.3.1(AW); 1.3.2(AW)
11.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation intervals shall be designated in hours of service, in cycles, or in other increment of the existing interval.
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(5)
	Interfaces: 1.3.1(AW); 1.3.2(AW)
12.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalations must not be used repetitively to, in effect, constitute a fleet time extension.
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 1 Paragraph 5A(5)
	Interfaces: 1.3.1(AW); 1.3.2(AW)
13.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation lists the operator's management personnel with escalation approval authority.
	Sources: 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(A)
14.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation ensure the operator's management personnel with escalation approval authority must have at least the equivalent authority for approving An operations specifications

		time increase. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(A)	
	15.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation ensure the operator's management personnel with escalation approval authority must have at least the equivalent authority for approving a maintenance interval adjustment controlled by a reliability program. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(A	
	16.	Check that the Certificate Holder's manual contains instructions and procedures that define the maximum limitations for a short-term escalation. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(B)	
	17.	Check that the Certificate Holder's manual contains instructions and procedures that contain the criteria that defines the type of data acceptable for justifying a short-term escalation. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(C)	
	18.	Check that the Certificate Holder's manual contains instructions and procedures that correspond with the overall maintenance program. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(D) *Interfaces:* 1.3.1(AW); 1.3.2(AW)	
	19.	Check that the Certificate Holder's manual contains instructions and procedures to ensure that an escalation will not create an unsafe condition. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(D) *Interfaces:* 1.3.1(AW); 1.3.2(AW)	
	20.	Check that the Certificate Holder's manual contains instructions and procedures that restrict the occurrence of repetitive Short-Term Escalations. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(E) *Interfaces:* 1.3.1(AW); 1.3.2(AW)	
	21.	Check that the Certificate Holder's manual contains instructions and procedures that provide a method for recording all escalations. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(F) *Interfaces:* 1.2.3(AW)	
	22.	Check that the Certificate Holder's manual contains instructions and procedures that Short-Term Escalation have provisions for reporting each use of an escalation to the CHDO. *Sources:* 8300.10 Volume 2 Chapter 80(CHG 12) Section 2 Paragraph 5(F)	
2.		Does the certificate holder's manual contain general policies for the Short-Term Escalations process that comply with the SRRs? SRRs: 121.135(b)(1)	☐ Yes ☐ No, Explain

3.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 121.135(b)(3)	☐ Yes ☐ No, Explain
4.	Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Short-Term Escalations process? SRRs: 121.135(b)(2)	☐ Yes ☐ No, Explain
5.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Short-Term Escalations process? SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain

SAI SECTION 1 - PROCEDURES ATTRIBUTE Drop-Down Menu
1.   No procedures, policy, instructions or information specified.
2.   Procedures or instructions and information do not identify (who, what, when, where, how).
3.   Procedures, policy or instructions and information do not comply with CFR.
4.   Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5.   Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6.   Procedures, policy or instructions and information unclear or incomplete.
7.   Documentation quality (e.g., unreadable or illegible).
8.   Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.   Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.   Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.   Other.

SAI SECTION 2 - CONTROLS ATTRIBUTE

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

Tasks
To meet this objective, the inspector must accomplish the following tasks:
1. Review the control questions below.
2. Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Short-Term Escalations process:	
1.1.	Is there a control or controls in place to ensure that the certificate holder's Short-Term Escalations remain within their authorized limits?	☐ Yes ☐ No, Explain
1.2.	Is there a control or controls in place to ensure that the certificate holder complies with the Short-Term Escalation provisions of its operations specifications?	☐ Yes ☐ No, Explain
1.3.	Is there a control or controls in place to ensure that the certificate holder informs the FAA certificate-holding district office (CHDO) when Short-Term Escalations are used?	☐ Yes ☐ No, Explain
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Short-Term Escalations process?	☐ Yes ☐ No, Explain

SAI SECTION 2 - CONTROLS ATTRIBUTE Drop-Down Menu	
1.	No controls specified.
2.	Documentation for the controls do not identify (who, what, when, where, how).
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE

Objective: Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety-related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection-related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

	Tasks
	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the process measurement questions below.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.

	Questions	
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Short-Term Escalations process include the following process measurements:	
1.1	Process measurements that would reveal when the certificate holder's Short-Term Escalations exceed their authorized limits?	☐ Yes ☐ No, Explain
1.2.	Process measurements that would reveal when the certificate holder failed to comply with the Short-Term Escalation provisions of its operations specifications?	☐ Yes ☐ No, Explain
1.3.	Process measurements that would reveal when the certificate holder failed to inform the FAA certificate-holding district office (CHDO) when Short-Term Escalations are used?	☐ Yes ☐ No, Explain
2	Is there a process measurement or process measurements that would reveal if the certificate holder s policy, procedures, instructions, and information contained in its manual were not followed?	☐ Yes ☐ No, Explain
3.	Does the certificate holder document its process measurement results?	☐ Yes ☐ No, Explain
4.	Does the certificate holder s manual provide for the use of process measurement results to improve its programs?	☐ Yes ☐ No, Explain
5.	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Short-Term Escalations process?	☐ Yes ☐ No, Explain

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE Drop-Down Menu
1.   No process measurements specified.
2.   Documentation for the process measurements does not identify (who, what, when, where, how).
3.   Inability to identify negative findings.
4.   No provisions for implementing corrective actions.
5.   Ineffective follow-up to determine effectiveness of corrective actions.
6.   Resources requirements (personnel, facilities, equipment, technical data).
7.   Other.

SAI SECTION 4 - INTERFACES ATTRIBUTE

Objective: Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different manuals within the certificate holder's manual system must be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the certificate holder's manual system.

Tasks	
	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the interfaces associated with the Short-Term Escalations process that have been identified along with the individual questions in section 1, Procedures, of this data collection tool.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.

Questions		
	To meet this objective, the inspector must answer the following questions: NOTE: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.	
1.	Does the certificate holder s manual properly address the interfaces that are identified along with the questions in section 1, Procedures, of this DCT?	☐ Yes ☐ No, Explain
2.	Does the certificate holder s manual document a method for assessing the impact of any changes to the associated interfaces within the Short-Term Escalations process?	☐ Yes ☐ No, Explain

SAI SECTION 4 - INTERFACES ATTRIBUTE Drop-Down Menu
1. No interfaces specified.
2. The following interfaces not identified within the Certificate Holder's manual system:
3. Interfaces listed are inaccurate.
4. Specific location of interfaces not identified within the manual system.
5. Other

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES

Objective: The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks	
	To meet this objective, the inspector must accomplish the following tasks:
1.	Identify the person who has overall responsibility for the Short-Term Escalations process.
2.	Identify the person who has overall authority for the Short-Term Escalations process.
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's manual clearly identify who is responsible for the quality of the Short-Term Escalations process?	☐ Yes ☐ No, Explain Name/Title:
2.	Does the certificate holder's manual clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Short-Term Escalations process?	☐ Yes ☐ No, Explain Name/Title:
3.	Does the certificate holder's manual include the duties and responsibilities of those who manage the work required by the Short-Term Escalations process? SRRs: 121.135(b)(2)	☐ Yes ☐ No, Explain
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Short-Term Escalations process? SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain
5.	Does the certificate holder s manual clearly and completely document the responsibility for this position?	☐ Yes ☐ No, Explain
6.	Does the certificate holder's manual clearly and completely document the authority for this position?	☐ Yes ☐ No, Explain
7.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having responsibility for the Short-Term Escalations process?	☐ Yes ☐ No, Explain
8.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Short-Term Escalations process?	☐ Yes ☐ No, Explain
9.	Does the certificate holder's manual clearly and completely document the procedures for delegation of authority for the Short-Term Escalations process?	☐ Yes ☐ No, Explain

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SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES Drop-Down Menu
1.   Not documented.
2.   Documentation unclear.
3.   Documentation incomplete.
4.   Other.